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April 1, 2025

VIA ECF

Hon. Jennifer L. Rochon, U.S.D.J.
U.S. District Court, S.D.N.Y.
500 Pearl Street
New York, NY 10007

RE: *Doe v. First Unum Life Insurance Company*, et al. 1:25-cv-00069-JLR
Letter Motion to Seal Documents

Judge Rochon:

I am the attorney for Plaintiff, Jane Doe (a fictitious name), in the above-captioned case. Pursuant to Your Honor's Order dated March 13, 2025 (ECF 29), Plaintiff timely submits her renewed Motion to Proceed Anonymously and accompanying Memorandum of Law in Support (together, "Plaintiff's Motion"). Plaintiff respectfully requests permission to file unredacted copies of her supporting exhibits under seal.

With Plaintiff's Motion, she submits supporting exhibits to the Affirmation of Jennifer Manger, dated April 1, 2025. Redacted versions of the exhibits have been filed on ECF. The redactions are narrowly tailored to omit only identifying information — consistent with the relief sought in the Motion. Pursuant to Your Honor's Individual Rule 4(B)(iii)(a), our office conferred with Defendants' counsel to narrow the scope of redactions. Defendants do not oppose Plaintiff's Motion. Nor do they not oppose sealing of the exhibits, as described above.

Sealing is further warranted for the reasons detailed in Plaintiff's Motion. The supporting exhibits include psychiatric assessments, clinical records, and an affidavit addressing Plaintiff's diagnoses, history of suicide attempt, and ongoing suicide risk. Public disclosure would compromise Plaintiff's privacy, pose a substantiated risk of psychological harm, and disrupt her treatment. It would also expose her to stigma and reputational harm, particularly given her role as a 33-year-old attorney at Paul, Weiss, Rifkind, Wharton & Garrison LLP.

Thank you for your time and attention to this matter.

Respectfully,

/s/ Jennifer Manger
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CERTIFICATE OF SERVICE

I, Jennifer Manger, hereby certify that on April 1, 2025, I caused the Letter Motion to Seal Documents to be electronically filed with the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007, with an electronically filed copy delivered to Greg J. Bennici and Rita E. Nerney at Robinson & Cole LLP, counsel for the Defendants.

Dated: April 1, 2024

Respectfully Submitted,

By: /s/ Jennifer Manger
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